

Federal Defenders OF NEW YORK, INC.

Southern District
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David E. Patton
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and Attorney-in-Chief

USDC SDNY
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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

December 10, 2019

VIA ECF

Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

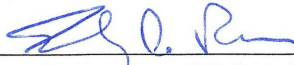
Re: United States v. Cambria Merrill
19 Cr. 695 (ER)

Dear Judge Ramos:

MEMO ENDORSED

The December 13 conference will proceed as scheduled.

SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: 12/10/2019
New York, New York


The defense writes with the consent of the Government to request that if the Court has not reached a decision on the defense's motion to transfer venue before Friday's scheduled conference, that the case be adjourned until a later date. The defense consents to waiving Speedy Trial time until that conference date. Should the Court be prepared to rule on Friday, if the Court is planning to grant Ms. Merrill's motion, the defense requests that Ms. Merrill's appearance be waived. The Government consents to this request.

In the event that the Court wishes the conference to go on as planned with Ms. Merrill present, the defense respectfully submits this request for a travel order. Pursuant to 18 U.S.C. § 4285, the defense

respectfully request that Your Honor endorse the enclosed order directing the U.S. Marshals Service to arrange for and fund Ms. Merrill's travel from Chicago, Illinois to New York, New York for her court appearance on Friday, December 13, 2019, as well as a return trip to Chicago, Illinois after her court appearance is complete. Ms. Merrill is indigent and qualifies for this relief under section 4285 of 18 U.S.C.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ 

Ian Marcus Amelkin
Assistant Federal Defender
(212) 417-8733

cc: AUSA Peter J. Davis (by ECF)